

FILED
U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FT. WORTH DIVISION

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION
MAY 30 PM 3:43
CLERK OF COURT

UNITED STATES OF AMERICA

v.

Criminal No.

HASSAN RAHMATI (01)

17 CR-095-A

INFORMATION

The United States Attorney Charges:

Count One

Conspiracy to Commit Money Laundering
(Violation of 18 U.S.C. §371)

1. Beginning in or about 2015, the exact date unknown, and continuing through on or about February 25, 2016, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendant, knowingly and intentionally combined, conspired, confederated, and agreed with other persons known and unknown to commit money laundering, in violation of 18 U.S.C. § 1956, by knowingly conducting and attempting to conduct financial transactions affecting interstate commerce, involving the proceeds represented to be that of specified unlawful activity, that is, Manufacturing and/or Distribution of a Controlled Substance in violation of 21 U.S.C. § 841, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds believed to be from a specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions was represented

to be the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(3).

Manner and Means of the Conspiracy and Scheme and Artifice to Defraud

2. It was part of this conspiracy that the defendant owned and operated a used car business called Stadium Auto, Inc.

3. It was further part of the conspiracy that the defendant would take the proceeds represented to be from the manufacturing and/or distribution of controlled substances, which were provided by UCA1 and UCA2, as payment for a used car sold by Stadium Auto, Inc., all in an effort to conceal or disguise the nature, the location, the source, the ownership, or control of the proceeds.

Overt Acts in Furtherance of the Conspiracy

4. In furtherance of the conspiracy and to achieve the objects thereof, the defendant, and other persons known and unknown, committed and caused to be committed the following acts, among others, in the Fort Worth Division of the Northern District of Texas, and elsewhere:

- a. From in or about 2015, the exact date unknown, and continuing through on or about February 25, 2016, the defendant and his employees knowingly took funds represented to be drug proceeds, in the form of cash, from UCA1 and UCA2 for the purchase of vehicles.

5. All in violation of 18 U.S.C. § 371.

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